

Commonwealth of Kentucky
Division for Air Quality
PERMIT STATEMENT OF BASIS

Title V (draft permit) No. V-99-001
JIM BEAM BRANDS COMPANY, OLD GRAND DAD PLANT
FRANKFORT, KY.
May 12, 2000
BRYAN HANDY, REVIEWER
Plant I.D. # 102-1320-0003
Application Log # F461

SOURCE DESCRIPTION:

Unit 01:	Barrel Filling, Aging and Dumping. Commenced Construction 1911-1991
Unit 02:	Cistern, Holding, Processing, and Bottling Tanks, Bottle Filling, Labeling and Coding, and VOC Equipment Leaks. Commenced Construction 1978-1996.
Unit 03:	Natural Gas Fired (#2 Oil Back-Up) Horizontally Opposed Indirect Heat Exchanger. Commenced Construction 1992.
Unit 04:	Natural Gas Fired (#2 Oil Back-Up) Horizontally Opposed Indirect Heat Exchanger. Commenced Construction 1992.

REGULATION APPLICABILITY:

All the applicable regulations to the emission units are listed in the permit. The following regulations are not applicable based on size of emission unit or applicability date of regulation.

REGULATION NOT APPLICABLE TO EMISSION UNIT 02 DUE TO PRODUCT PRODUCED:

Regulation 401 KAR 60:480, Standards of performance for equipment leaks of VOC in the synthetic organic chemicals manufacturing industry, incorporating by reference 40 CFR 60.482, Subpart VV, applicable to VOC leaks in affected facilities that commenced construction or modification after January 5, 1981.

COMMENTS:

1. The permittee has not proposed any alternative operating scenarios for any of the emission units.
2. The three hour averaging time associated with the particulate matter mass emission standards for emission units 03 and 04 are applicable during compliance demonstration when performance testing is required by the Division.

3. The permittee may ensure compliance with the emissions limitations and standards, while burning #2 fuel oil, conditioned within the permit for Emissions Units 03 and 04 by performing the calculations based upon heat and sulfur content, fuel usage and processing rates, and emission factor information. Compliance for sulfur dioxide emissions limitations may also be ensured by using fuel supplier certification.
4. No applicable regulations apply to Emissions Units 01 and 02.
5. Any indirect heat exchanger burning natural gas is considered to be in compliance with PM, SO₂ and opacity standard.
6. This permit contains provisions which require that specific test methods, monitoring or record keeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has not incorporated these provisions in its air quality regulations.